

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) **Case No.** 22-21412-GLT
Kathleen T. Meinert,)
 Debtor,) **Chapter 13**
Kathleen T. Meinert,)
 Movant,)
 vs.)
PNC Bank, N.A. and Ronda J.)
Winneccour, Chapter 13 Trustee)
 Respondents.) **Document No.**

**DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT
CHANGE FILED ON MARCH 8, 2023**

AND NOW, come the Debtor, Kathleen T. Meinert, by and through her attorneys, Calaiaro Valencik and David Z. Valencik, and present the following Declaration regarding the Notice of Mortgage Payment Changes filed on March 8, 2023:

1. Kathleen T. Meinert (the "Debtor") filed an emergency Chapter 13 bankruptcy on July 27, 2022, at Case No. 22-21412 GLT.
2. PNC Bank, N.A. (hereinafter "PNC") holds a home equity line of credit on the property at 128 Crystal Springs Drive, Cranberry Township, Pennsylvania 16066.
3. PNC filed Notice of Mortgage Payment Change ("NMPC") on March 8, 2023. The March 8, 2023 NMPC proposed to decrease the payment to PNC by \$20.44 due to a change in the interest rate.
4. The Debtor filed an amended plan on September 9, 2022.
5. The Amended Plan provides for the property at 128 Crystal Springs Drive, Cranberry Township, Pennsylvania 16066 be sold.
6. The Amended Plan provides for adequate protection payments prior to the sale.

7. Upon sale of the property, PNC will be paid from the proceeds of the sale.
8. The current plan is sufficient because it provides adequate protection prior to a sale of the property.
9. There is no need to file an amended plan at this time.

Respectfully Submitted,

Date: March 29, 2023

BY: /s/ David Z. Valencik
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